

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO. 11-146
V.	*	SECTION: A
JUAN RAMON ENAMORADO	*	
a/k/a Angel		
a/k/a Luis H. Gomez	*	
a/k/a Luis Horlando Gomez		
	* * *	

FACTUAL BASIS

Should this matter have gone to trial, the Government would have proved beyond a reasonable doubt, through the introduction of competent testimony and admissible tangible exhibits, the following facts to support the allegations charged by the Indictment now pending against the defendant:

The Defendant, **JUAN RAMON ENAMORADO** (hereinafter “**ENAMORADO**”), has agreed to plead guilty as charged to the two-count Indictment charging him two counts of unlawful transfer of a false identification document, in violation of Title 18, United States Code, Section 1028(a)(2).

In June 2010, agents of Homeland Security Investigations (hereinafter “HSI”) received information from a confidential source that an individual named “Angel”, later

learned to be the defendant, **ENAMORADO**, was selling fraudulent identification documents. On February 23, 2011, a confidential informant (hereinafter "CI"), under the direction of HSI agents, placed a recorded telephone call to **ENAMORADO**, who answered to the name Angel. The CI arranged a meeting with **ENAMORADO** to purchase a set of documents that included a Permanent Resident Card and Social Security card for \$130. The CI and **ENAMORADO** agreed to meet at an apartment in Metairie, Louisiana.

After the telephone call, HSI agents provided the CI with currency for the purchase of identification documents from **ENAMORADO**. Later that same day, **ENAMORADO** and the CI met at the agreed-upon apartment in Metairie. **ENAMORADO** arrived in a black Chevrolet Colorado with Louisiana license plate number X319382. Video and audio surveillance in the apartment would show that **ENAMORADO** told the CI that it would cost \$130 to purchase the fraudulent documents. **ENAMORADO** instructed the CI to write the CI's name and date of birth in a notebook **ENAMORADO** brought to the meeting, and **ENAMORADO** collected \$60 as a deposit on the identification documents. **ENAMORADO** photographed the CI, and **ENAMORADO** and the CI agreed to meet the next day to complete the transaction. **ENAMORADO** then exited the apartment. Upon leaving the meeting, agent surveillance of **ENAMORADO** revealed that he arrived at an apartment in the 4800 block of Yale Street in Metairie.

The following day, on February 24, **ENAMORADO** and the CI had a recorded telephone conversation in which they agreed to meet to complete the document transfer. A short time later, the CI met with **ENAMORADO** in the parking lot of the same apartment where they had met the previous day. **ENAMORADO** again arrived in a black Chevrolet Colorado with Louisiana license plate number X319382. **ENAMORADO** gave the CI an envelope in exchange for the remaining \$70. **ENAMORADO** then left the location. The envelope contained a Social Security card bearing Social Security Number XXX-XX-1551 with the name Jose Torres. The envelope also contained a Permanent Resident Card bearing Alien Registration Number XXX-XXX-481 and a photograph of the CI with the name Jose Torres. Further, the envelope contained the piece of paper on which the CI wrote out his name and date of birth that was given to **ENAMORADO**. The Permanent Resident Card and Social Security card were remitted to HSI agents by the CI.

An official with United States Citizenship and Immigration Services (hereinafter “CIS”) would testify that Permanent Resident Cards are issued to individuals who lawfully apply for and are granted Lawful Permanent Resident status by CIS. The CIS official would testify that a Permanent Resident Card also known as a Form I-551 or “Green Card”, is issued to a Lawful Permanent Resident for entry into and evidence of authorized stay and employment in the United States. The CIS official would testify each person granted Lawful Permanent Resident status is issued an Alien Registration number,

which is printed on the Permanent Resident Card issued to that person. The CIS official would further testify that the issuance of Permanent Resident Cards is administered by CIS, an agency of the United States Department of Homeland Security, and is regulated by CIS and HSI.

The CIS official would also testify that Alien Registration number XXX-XXX-481 printed on the Permanent Resident Card transferred by **ENAMORADO** was assigned to a person other than the CI or “Jose Torres” according to CIS records.

An official from the Social Security Administration would testify that Social Security numbers are issued by that agency to individuals who lawfully apply for Social Security cards. Records from the Social Security Administration would be introduced into evidence to show that Social Security account number XXX-XX-1551 was not properly assigned to the CI or “Jose Torres”.

An HSI agent would testify that he encountered **ENAMORADO** in May 2011. The HSI agent would testify that he determined **ENAMORADO** was illegally present in the United States. **ENAMORADO** told the agents his true name, Juan Ramon Enamorado.

Finally, a forensic document examiner from the HSI Forensic Document Laboratory would testify that upon he conducted physical, microscopic, instrumental and comparative examinations of the Social Security card bearing Social Security Number XXX-XX-1551 and the Permanent Resident Card bearing Alien Registration Number

XXX-XXX-481, which were transferred by **ENAMORADO** on February 24, 2011. The forensic document examiner would testify that he determined both of those identification documents to be counterfeit.

ROBERT WEIR
Special Assistant United States Attorney

Date

JUAN RAMON ENAMORADO
Defendant

Date

CATHERINE CHAVARRI
Attorney for Defendant

Date